

EXHIBIT C

CAREY RODRIGUEZ MILIAN GONYA, LLP

Carey Rodriguez Milian Gonya, LLP is a boutique law firm that focuses on serving its clients in litigation involving consumer class action, intellectual property and complex commercial disputes. With offices in Miami, Washington, D.C., and Paris the firm represents an impressive roster of U.S. and international clients, including Fortune 500 corporations, investment funds, middle market companies and entrepreneurs.

OUR FIRM

We are known for handling high-stakes plaintiff and “bet the company” defense cases for corporations and individuals in a variety of practice areas across the United States and abroad, including nationwide class actions, reinsurance disputes, real property litigation, internal corporate disputes, and international banking controversies.

Our impressive record of successful outcomes, both in and out of court, speaks for itself.

Our lawyers, which include former federal law clerks and graduates from top-tier law schools, cut their teeth in some of the country’s most prestigious law firms and are respected among their peers, judges, and arbitrators as tenacious out-of-the-box problem solvers and forceful advocates.

While we know that most cases never see the inside of a courtroom, our lawyers bring to the table decades of experience trying complex commercial and intellectual property cases to verdict before juries, judges, and arbitration panels. Our goal is to maximize the prospect of a recovery for the client, whether through verdict or settlement, and to accomplish that goal we prepare for trial using innovative techniques to marshal the evidence and portray a compelling story that impacts the conscience of the trier of fact.

We are mindful of the financial quagmire created by the discovery process and we tailor our discovery methods to focus on the main issues instead of getting bogged down in meaningless discord. We employ state of the art software to analyze electronic discovery for the most useful packets of information without wasteful frolic.

The roadmap to our clients' success is our wisdom and experience. We identify realistic goals and objectives at the outset of the engagement. We anticipate foreseeable obstacles. And we stay focused on our clients' goals by "driving to the hoop" at the outset of the case and always maintaining our winning focus.

CLASS ACTION, MULTIDISTRICT LITIGATION

Carey Rodriguez regularly represents nationwide groups of consumers in high-stakes, and often times cutting-edge, class action matters in the data privacy and consumer protection realms.

The lawyers and other professionals in our class action practice group bring creativity, energy, and superior litigation abilities to bear in every case, and we use those skills to provide strong, efficient, and cost-effective representation to all those we have the opportunity to represent as class counsel.

DAVID P. MILIAN

David is a seasoned trial lawyer and senior partner in Carey Rodriguez Milian Gonya, LLP. David's practice focuses on complex investor, shareholder and partnership disputes; consumer privacy and investment class action litigation; litigation in the commercial finance, manufacturing, real estate, banking, and entertainment industries; unfair competition and deceptive trade practices; trademark infringement copyright and theft of trade secrets litigation; foreign corrupt practices, money laundering and wire fraud claims pursuant to Florida and Federal Civil RICO statutes; professional malpractice claims; and director and officer liability. David represents clients in matters brought before federal and state court judges and juries, and domestic and international arbitration panels. David also has significant experience in evaluating and bringing claims on behalf of bankruptcy trustees, receivers, and investors, particularly securities and other commercial fraud actions.

David is recognized in Best Lawyers in America (2008-present), Florida Super Lawyer for Business Litigation (2008-present), Florida Trend Magazine as Florida's Legal Elite in Commercial Litigation (2008-present), AV® Preeminent Rating by Martindale Hubbell (1999-present), and AV® Preeminent rating by a survey of peers in Intellectual Property Law. The South Florida Daily Business Review also recognized David as a finalist for Most Effective Lawyer of South Florida in 2010.

David graduated with honors from the University Of Florida College Of Law in 1989 where he was executive Articles Editor for the Florida Journal of International Law and is now an active member of the Cuban American Bar Association. David is fluent in Spanish and represents a diversity of individual consumers in class action cases as well as corporate and private clients from Latin America and the U.S.

David serves on the Board of Directors and is outside legal counsel to Shake-A-Leg Miami—a charity devoted to serving the needs of disabled children.

ADMITTED TO PRACTICE

- Florida, 1990
- United States District Court, Southern and Middle Districts of Florida, 1990, Western District Wisconsin, 2016
- United States Court of Appeals, 11th Circuit, 1991, 7th Circuit, 2017, 9th Circuit, 2018

EDUCATION

- B.A., with honors, University of Florida, Gainesville, Florida (1986)
- J.D., with honors, University of Florida College of Law, Gainesville, Florida (1989)
 - Executive Articles Editor, Florida Journal of International Law
 - Fellowship instructor, University of Florida College of Law Appellate Advocacy Program
 - Recipient, American Jurisprudence Awards for Torts and Constitutional Law.

MEMBERSHIPS

- Florida Bar Civil Procedure Rules Committee, 2006-2012; E-Discovery Subcommittee; Chair of Rule 1.380 and other sub-committees
- Miami-Dade County Bar Association, Board of Directors 1997-2002
- Florida Bar Board of Governors (YLD) 1998-2004
- American Bar Association, Trial Practice Committee; Trial Evidence Committee
- Florida Eleventh Judicial Circuit Grievance Committee 2000-2003
- Florida Bar Special Committee on Multi-jurisdictional and Unlicensed Practice of Law
- Member of Cuban American Bar Association 1990-present.

JOHN C. CAREY

John Carey is an intellectual property litigator with first chair trial experience and he heads the firm's practice in this area. In patent and trade secret cases, Mr. Carey's experience has spanned technologies as complex and diverse as digital video systems, microprocessor design, global navigational devices, virtual private networks, portable storage media, remote computer interface systems, automobile manufacturing, angioplasty catheters, satellite data transmission, data compression protocols, computer graphical user interfaces, shape memory metal alloys, and many other areas. In trademark and copyright matters, Mr. Carey has litigated claims regarding some of the world's most recognizable trademarks and copyrighted works in a variety of industries, including pharmaceuticals, hotels, and music.

Prior to founding Carey Rodriguez Milian Gonya, Mr. Carey was a partner with Stroock & Stroock & Lavan LLP and Kilpatrick Stockton LLP, where he led the South Florida intellectual property practices of these national law firms. He also previously practiced law in the patent litigation group at Fish & Neave in New York. In addition, Mr. Carey co-founded and served as the chief executive officer of an enterprise software development company in Fort Lauderdale, Florida.

ADMITTED TO PRACTICE

- Florida
- New York
- U.S. Supreme Court
- U.S. Court of Appeals: Federal Circuit, Eleventh Circuit, Ninth Circuit
- U.S. District Courts: Southern and Middle Districts of Florida, Southern and Eastern Districts of New York

EDUCATION

- Juris Doctor, University of Virginia, 1993
- Bachelor of Science, *with honors*, United State Military Academy at West Point, 1989

MEMBERSHIPS

- West Point Society of South Florida (Board of Governors; Past President)
- University of Virginia Business Advisory Council

- American Bar Association, Section of Intellectual Property Law
- American Intellectual Property Law Association

REPORTED CASES

- *In re Cygnus Telecommunications, LLC Patent Litigation*, 481 F.Supp.2d 1029 (N.D. Cal. 2007) (granting summary judgment of patent invalidity and noninfringement), affirmed, ---F.3d---, 2008 WL 3842906 (Fed. Cir. 2008)
 - *Four Seasons Hotels and Resorts, B.V. v. Consorcio Barr, S.A.*, 533 F.3d 1349 (11th Cir. 2008) (affirming arbitration award)
 - *Clearplay, Inc. v. Nissim Corp.*, 555 F.Supp.2d 1318 (S.D. Fla. 2008) (dismissing complaint for tortious interference arising out of patent enforcement activities)
 - *Catch Curve, Inc. v. Venali, Inc.*, 519 F.Supp.2d 1028 (C.D. Cal. 2008) (denying motion to dismiss antitrust counterclaims against sham patent litigation)
 - *Rexam Airspray, Inc. v. Arminak*, 471 F.Supp.2d 1292 (S.D. Fla. 2007) (dismissing complaint alleging breach of confidentiality and trade secret theft for lack of personal jurisdiction)
 - *Four Seasons Hotels and Resorts, B.V. vs. Consorcio Barr, S.A.*, 267 F. Supp. 2d 1268 (S.D. Fla. 2003) (awarding final judgment of multi-million dollars in damages and attorney's fees for computer hacking, trade secret misappropriation and trademark infringement)
 - *Nissim Corp. v. ClearPlay, Inc.*, 351 F. Supp. 2d 1343 (S.D. Fla. 2004) (finding out-of-state corporate officer subject to suit for patent infringement)
 - *Nutrivida, Inc. v. Inmuno Vital, Inc.*, 46 F. Supp. 2d 1310 (S.D. Fla. 1998) (awarding final judgment of multi-million dollars in damages and attorneys' fees for trademark infringement and unfair competition)
 - *Inmuno Vital, Inc. v. Golden Sun, Inc.*, 49 F. Supp. 2d 1344 (S.D. Fla. 1997) (granting summary judgment of trademark ownership against prior user)
 - *Chazan Medical Devices, Inc. v. Sulzer Intermedics, Inc.*, 1999 U.S. App. LEXIS 28436 (9th Cir. 1999) (granting injunction against trade secret theft)
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- Board Certified Intellectual Property Lawyer by The Florida Bar
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- Listed in *The Best Lawyers in America* for Intellectual Property
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- [Intellectual Property Litigation](#) (Head of Practice)
 - [Intellectual Property Acquisition](#), Licensing & Counseling
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